

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-2(c) GRUBER, COLABELLA & LIUZZA 41 Lakeside Blvd. Hopatcong, NJ 07843 973-398-7500 rh@gruberlaw-nj.com	
In Re: Randy and Ruth Van Zile 4777 284 <sup>th</sup> St Branford, FL 32008 SS#8482 and #2041	Case No.: 16-30566 JKS Chapter 7  Hearing Date: May 2, 2017 10:00 am  Judge: John K. Sherwood, USBJ

**Notice of Motion to Reopen Case and Enlarge the Time  
to File a Reaffirmation Agreement**

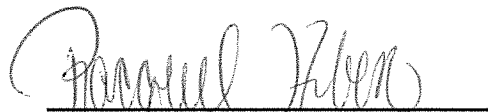
**Steven P. Kartzman, Esq. Trustee**  
101 Gibraltar Dr Ste 2F  
Morris Plains, NJ 07950

**Gateway One Lending and Finance**  
106 N Riverview Dr Ste 100  
Anaheim, CA 92808

**PLEASE TAKE NOTICE** that on **May 2, 2017** at 10:00 o'clock in the forenoon, or as soon thereafter as counsel may be heard, the undersigned attorney for the Debtor shall move before the Honorable John K. Sherwood, United States Bankruptcy Judge, Newark, New Jersey for an Order as follows:

1. Directing that the above referenced case be reopened for purposes of allowing the Debtor to obtain and file a Reaffirmation Agreement with Gateway One Lending and Finance.
2. Oral Argument is waived.

Date: March 27, 2017

  
\_\_\_\_\_  
Racquel Hiben  
Attorney for Debtor

GRUBER, COLABELLA, LIUZZA & THOMPSON  
41 Lakeside Blvd.  
Hopatcong, NJ 07860  
973-398-7500  
rh@gruberlaw-nj.com

**UNITED STATES BANKRUPTCY COURT**  
District of New Jersey- Newark

In Re:

Randy and Ruth Van Zile  
25 Cypress Drive  
Denville, NJ 07834

**Certification in Support of Notice of  
Motion to Reopen Case**

**Hearing Date: May 2, 2017 10:00 am**

**Case No.: 16-30566 JKS**

SS#8482 and #2041

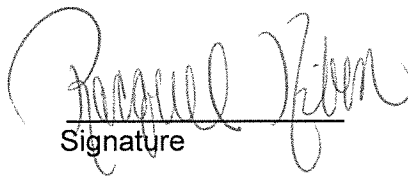
---

**Racquel Hiben**, being of full age, do hereby certify as follows:

1. I am the attorney for the Debtors, Randy and Ruth Van Zile, and am fully familiar with the facts of this case.
2. The Debtor's Bankruptcy Discharge issued on February 2, 2017. The case closed on February 8, 2017.
3. On February 28, 2017 the Debtors came to my office and asked that a reaffirmation agreement be filed for their vehicle loan so that they could receive a monthly bill and updates on their loan from Gateway One Lending and Finance.
4. A review of the file and a search of PACER indicated that a Reaffirmation Agreement was not filed with the Bankruptcy Court. The client's payments to the account are up-to-date.
5. On March 8, 2017 my Bankruptcy Assistant spoke with Charles at Gateway One Lending and Finance and was advised that billing would recommence only when a reaffirmation agreement was signed by the clients and filed with the Bankruptcy Court.

I certify that the foregoing statements made by me in the annexed Certification are true.  
I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Date: March 27, 2017

  
Signature

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Racquel Hiben, Esq  
41 Lakeside Blvd.  
Hopatcong, NJ 07843  
973-398-7500 - Phone  
973-398-5579 - Fax  
rh@gruberlaw-nj.com

In Re:

Randy and Ruth Van Zile  
4777 284th St  
Branford, FL 32008  
201-841-3554

Case No.: 16-30566 JKS

Chapter: 7

Adv. No.: \_\_\_\_\_

Hearing Date: \_\_\_\_\_

Judge: Sherwood

**CERTIFICATION OF SERVICE**

1. I, Susan McDermott :

☐ represent \_\_\_\_\_ in this matter.

☒ am the secretary/paralegal for Racquel Hiben, Esq, who represents  
the Debtors in this matter.

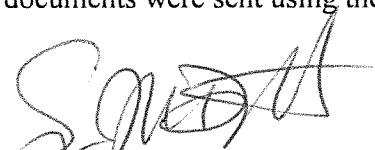
☐ am the \_\_\_\_\_ in this case and am representing myself.

2. On March 24, 2017, I sent a copy of the following pleadings and/or documents  
to the parties listed in the chart below.

Notice of Motion  
Certification of Racquel Hiben, Esq.  
Order

3. I certify under penalty of perjury that the above documents were sent using the mode of service  
indicated.

Date: 3/27/17

  
\_\_\_\_\_  
Signature

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Steven P. Kartzman, Esq 101 Gibraltar Dr. Ste 2F Morris Plains, NJ 07950	Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input checked="" type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
Gateway One Lending and Finance 106 N Riverview Dr. Ste 100 Anaheim, CA 92808		<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input checked="" type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)